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REMARKS

The Office Action dated September 22, 2005, has been received and carefully considered. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Indefinite Rejection of Claims 1, 17, 31, 40 and 47

At page 2 of the Office Action, claims 1, 17, 31, 40 and 47 are rejected under 35 U.S.C. Section 112 as being indefinite for failing to particularly point out and distinctly claim the subject matter. This rejection is hereby respectfully traversed.

Claim 1 recites "sending a first encrypted routine of a software driver." Claims 17, 31, 40 and 47 include similar language. The Examiner asserts that this phrase is indefinite because it could be interpreted as "sending an encrypted driver software routine." *Office Action*, p. 2. Applicants respectfully disagree that the phrase is ambiguous. One of ordinary skill in the art would understand that a software driver can include one or more routines, and would also understand that one of the software driver routines can be encrypted and sent. Accordingly, there is no ambiguity or indefiniteness in the claimed element.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1, 17, 31, 40 and 47 is improper. Withdrawal of this rejection and reconsideration of these claims therefore is respectfully requested.

Anticipation Rejection of Claims 1, 9, 10, 12, 31, 32, 47, 49, 52 and 54

At page 3 of the Office Action, claims 1, 9, 10, 12, 31, 32, 47, 49, 52 and 54 are rejected under 35 U.S.C. Section 102(e) as being anticipated by Glover (U.S. Patent No. 6,868,495). This rejection is hereby respectfully traversed.

Claim 1, from which claims 9, 10 and 12 depend, recites "sending a first encrypted routine of a software driver to a peripheral device" and "decrypting, at the peripheral device, the first encrypted routine to generate a plaintext routine." These elements are not disclosed or suggested by Glover. Glover discloses a system including a file system driver and a device

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driver, wherein the device driver receives encrypted code from a file system driver, passes the encrypted code to an operating system, receives the encrypted code from the operating system, and decrypts the code. Glover, col. 11, lines 1-19. Accordingly, in the Glover system the encrypted code is decrypted at device driver. The encrypted code is not provided to a peripheral device, and is not decrypted at a peripheral device as recited in claim 1. In addition, there is no disclosure that the encrypted data of Glover is a routine of a software driver. Therefore, Glover fails to disclose or suggest each and every element of claim 1.

Claims 1, 9, 10 and 12 depend from claim 1. Accordingly, Glover fails to disclose each and every element of these claims, at least by virtue of their dependence on claim 1. In addition, these claims recite additional non-obvious elements.

With respect to claim 31, the claim recites "a peripheral device, said peripheral device to decrypt a first encrypted routine and generate a plaintext routine" and "a software driver, wherein said software driver is to interface with said peripheral device." These elements are not disclosed or suggested by Glover. As explained above, Glover does not disclose a software driver that interfaces with a peripheral device, where the peripheral device decrypts an encrypted routine. Accordingly, Glover fails to disclose or suggest each and every element of claim 31.

Claim 32 depends from claim 31. Accordingly, Glover fails to disclose each and every element of this claim, at least by virtue of their dependence on claim 1. In addition, this claim recites additional non-obvious elements.

With respect to claim 47, the claim recites "sending a first encrypted routine of a first software driver to a peripheral device" and "decrypting, at the peripheral device, the first encrypted routine to generate a plaintext routine." As explained above, Glover does not disclose or suggest these elements.

With respect to claim 49, the claim recites "sending a first encrypted data associated with an application to a peripheral device, wherein the application is to interface with the peripheral device" and "decrypting, at the peripheral device, the first encrypted data to generate a plaintext data." As explained above, Glover does not disclose or suggest sending encrypted data

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associated with an application to a peripheral device and decrypting the data at the peripheral device. Accordingly, Glover fails to disclose or suggest each and every element of claim 49.

Claims 52 and 54 depend from claim 49. Accordingly, Glover fails to disclose each and every element of these claims, at least by virtue of their dependence on claim 49. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the rejection of claims 1, 9, 10, 12, 31, 32, 47, 49, 52 and 54 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 2, 3, 8, 11, 13, 16, 33, 38, 39, 50 and 51

At page 6 of the Office Action, claims 2, 3, 8, 11, 13, 16, 33, 38, 39, 50 and 51 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over Glover in view of Candelore (U.S. Patent Application Publication No. 2002/0073315). This rejection is hereby respectfully traversed.

Claims 2, 3, 8, 11, 13 and 16 depend from claim 1. Claims 33, 38, and 39 depend from claim 31. Claims 50 and 51 depend from claim 49. As explained above, Glover fails to disclose each and every element of claims 1, 31 and 49. In addition, Candelore does not remedy the deficiencies of Glover. Accordingly, Glover and Candelore, individually and in combination, do not disclose or suggest each and every element of claims 2, 3, 8, 11, 13, 16, 33, 38, 39, 50 and 51 at least by virtue of their respective dependence on claims 1, 31 and 49. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the rejection of claims 2, 3, 8, 11, 13, 16, 33, 38, 39, 50 and 51 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 4-7, and 53

At page 8 of the Office Action, claims 4-7, and 53 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over Glover in view of Freeman (U.S. Patent Application Publication No. 2002/0129374). This rejection is hereby respectfully traversed with amendment.

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Claims 4-7 depend from claim 1. Claim 53 depends from claim 49. As explained above, Glover fails to disclose each and every element of claims 1 and 49. In addition, Freeman does not remedy the deficiencies of Glover. Accordingly, Glover and Freeman, individually and in combination, do not disclose or suggest each and every element of claims 4-7 and 53 at least by virtue of their respective dependence on claims 1 and 49. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 4-7, and 53 is improper. Reconsideration of the claims and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 14 and 15

At page 10 of the Office Action, claims 14 and 15 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over Glover in view of Wilson (U.S. Patent No. 4,520,232). This rejection is hereby respectfully traversed with amendment.

Claims 14 and 15 depend from claim 1. As explained above, Glover fails to disclose each and every element of claim 1. In addition, Wilson does not remedy the deficiencies of Glover. Accordingly, Glover and Wilson, individually and in combination, do not disclose or suggest each and every element of claims 14 and 15 at least by virtue of their dependence on claim 1. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the rejection of claims 14 and 15 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 17-27, 30, 34-37, and 40-46

At pages 10 and 16 of the Office Action, claims 17-27, 30, 34-37, and 40-46 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over Glover in view of Freeman and in view of Candelore. This rejection is hereby respectfully traversed with amendment.

Claim 17 recites "sending a first encrypted routine of a software driver to a graphics chip, wherein the software driver is to interface with the graphics chip, and where the first encrypted

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routine is an encrypted version of an encryption routine” and “decrypting, at the graphics chip, the first encrypted routine to generate a plaintext routine, wherein the plaintext routine is a version of the encryption routine.” As explained above, Glover does not disclose sending an encrypted routine of a software driver to a peripheral device, such as a graphics chip, and further does not disclose decrypting the encrypted routine at the graphics chip. In addition, Freeman and Candelore do not remedy the deficiencies of Glover. Accordingly, Glover, Freeman and Candelore, individually and in combination, fail to disclose or suggest each and every element of claim 17.

Claim 40 recites “a first interface to receive a first encrypted routine of a software driver” and “a first hardware component to decrypt the first encrypted routine.” As explained above, As explained above, Glover does not disclose a system with a first interface to receive and encrypted routine of a software driver, and further does not disclose a hardware component to decrypt the encrypted routine at the graphics chip. In addition, Freeman and Candelore do not remedy the deficiencies of Glover. Accordingly, Glover, Freeman and Candelore, individually and in combination, fail to disclose or suggest each and every element of claim 40.

Claim 18-27 and 30 depend from claim 17. Claims 34-37 depend from claim 31. Claims 41-46 depend from claim 40. Accordingly, Glover, Freeman and Candelore, individually and in combination, do not disclose or suggest each and every element of claims 18-27, 30, 34-37 and 41-46 at least by virtue of their respective dependence on claims 17, 31 and 40. In addition, these claims recite additional non-obvious elements.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 17-27, 30, 34-37, and 40-46 is improper. Reconsideration of the claims and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 28 and 29

At page 17 of the Office Action, claims 28 and 29 are rejected under 35 U.S.C. Section 103(a) as being unpatentable over Glover in view of Freeman, in view of Candelore and in view of Wilson. This rejection is hereby respectfully traversed with amendment.

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Claims 28 and 29 depend from claim 17. As explained above, Glover, Freeman and Candelore fail to disclose each and every element of claim 17. Further, Wilson does not remedy the deficiencies of the other references. Accordingly, Glover, Freeman and Candelore, individually and in combination, do not disclose or suggest each and every element of claims 28 and 29 at least by virtue of their respective dependence on claim 17.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 28 and 29 is improper. Reconsideration of the claims and withdrawal of this rejection therefore is respectfully requested.

Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

If the Commissioner believes additional fees are due, the Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,

Date

12/24/05



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